



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 29, 2017

Leanna Bosarge
Director
Regulatory Affairs
Control Solutions, Inc.
5903 Genoa Red Bluff
Pasadena, TX 77507

Subject: Notification per PRN 98-10 – revise compatible products
Product Name: Quali-Pro Todal
EPA Registration Number: 53883-410
Application Date: 10/24/2017
Decision Number: 535358

Dear Ms. Bosarge:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, please contact Jacquelyn Herrick by phone at 703-347-0559, or via email at herrick.jacquelyn@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Gene Benbow for".

Gene Benbow, Product Manager 07
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

RESTRICTED USE PESTICIDE

DUE TO TOXICITY TO NON-TARGET INVERTEBRATES, MAMMALS, AND AQUATIC ORGANISMS FOR SALE TO AND USE ONLY BY CERTIFIED APPLICATORS OR PERSONS UNDER THEIR DIRECT SUPERVISION AND ONLY FOR THOSE USES COVERED BY THE CERTIFIED APPLICATOR'S CERTIFICATION.

NOTIFICATION

53883-410

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

11/29/2017

Quali-Pro® Todal

Nematicide/Insecticide

For control of turf-parasitic nematodes on golf course greens, tees and fairways.

ACTIVE INGREDIENT:

Abamectin (CAS No. 65195-56-4 and 65195-55-3): 1.9%

INERT INGREDIENTS: 98.1%

Total: 100.0%

Contains 0.15 lb. abamectin per gallon.

KEEP OUT OF REACH OF CHILDREN

WARNING / AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)



Manufactured for:
Control Solutions, Inc.
5903 Genoa Red Bluff
Pasadena, TX 77507

EPA Reg. No: 53883-XXX
EPA Est. No: _____
Net Contents: _____

FIRST AID

IF SWALLOWED:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
IF IN EYES:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. • Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
IF INHALED:	<ul style="list-style-type: none"> • Move the person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. • Call a poison control center or doctor for further treatment advice

NOTE TO PHYSICIAN: Early signs of intoxication include mydriasis (dilated pupils), ataxia (unsteadiness), and muscle tremors. Toxicity follows accidental ingestion of Quali-Pro Abamectin 0.15 EC and can be minimized by promptly administering activated charcoal. If toxicity from exposure has progressed to cause severe vomiting, the extent of resultant fluid and electrolyte imbalance should be gauged. Appropriate supportive parental fluid replacement therapy should be given, along with other required supportive measures (such as maintenance of blood pressure levels and respiratory functionality) as indicated by clinical signs, symptoms, and measurements. In severe cases, observations should continue for at least several days until clinical condition is stable and normal. Since abamectin is believed to enhance GABA activity in animals, it is probably wise to avoid drugs that enhance GABA activity (barbiturates, benzodiazepines, valproic acid) in patients with potentially toxic abamectin exposure.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall® at (866) 897-8050 for emergency medical treatment information.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: May be fatal if swallowed. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Harmful if absorbed through skin or inhaled. Avoid contact with skin. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Prolonged or frequently repeated exposure may cause allergic reactions in some individuals.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Some materials that are chemical-resistant to this product are listed below.

Applicators and other handlers must wear:

- Coveralls over a short sleeve shirt and short pants
- Chemical resistant gloves made of barrier laminate or butyl rubber \geq 14 mils
- Chemical resistant footwear plus socks
- Protective eyewear
- Chemical-resistant headgear for overhead exposure
- Chemical resistant apron when cleaning equipment, mixing, or loading

USER SAFETY REQUIREMENTS

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users Should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and wildlife. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash water or rinsate.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are foraging in or adjacent to the treatment area.

Use of this product may pose a risk to threatened and endangered species of fish, amphibians, crustaceans (including fresh water shrimp), and insects. All use of this product in the state of California should comply with the recommendations of the California Endangered Species Project. Before using this product in California, consult with your county agriculture commissioner to determine use limitations that apply in your area.

Surface Water Advisory

This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water. This product is classified as having a medium potential for reaching both surface water and aquatic sediment via runoff for several weeks to months after application. A level, well maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential loading of abamectin from runoff water and sediment. Runoff of this product will be reduced by avoiding applications when rainfall is forecast to occur within 48 hours.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

Attention: This product contains a chemical known to the State of California to cause birth defects or other reproductive harm.

DIRECTIONS FOR USE

RESTRICTED USE PESTICIDE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements, specific to your State or Tribe, consult the agency responsible for pesticide regulation.

FAILURE TO FOLLOW DIRECTIONS AND PRECAUTIONS ON THIS LABEL MAY RESULT IN CROP INJURY, POOR INSECT CONTROL, AND/OR ILLEGAL RESIDUES.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Do not re-enter treated areas until sprays have dried.

NEMATODE CONTROL ON GOLF COURSE GREENS, TEES AND FAIRWAYS

Quali-Pro Todal is an emulsifiable concentrate containing 0.15 lbs abamectin/gallon which, when applied according to directions for use, will control turf-parasitic nematodes on golf courses. Quali-Pro Todal should be applied as a seasonal program. Multiple applications may be required before improvements in turf quality are observed.

Add the specified amount of product directly to the spray tank and mix well. It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

Apply Quali-Pro Todal as an early curative treatment (after appropriate nematode extraction, identification, and counts).

Apply in the early morning while grass is wet with dew or irrigate the area prior to application with 0.1 inches of water. Spray onto wet turf. Irrigate with 0.1 to 0.5 inches of water beginning within 1 hour of application to move Quali-Pro Todal through the thatch. For best results, irrigate before the spray droplets have dried on the turf.

Apply in 2 gallons of water per 1,000 square feet of turf. When lower application volumes are used, irrigating in should begin as soon as possible after application. For best results, use spray nozzles that produce extremely coarse droplets [such as Turbo Floodjet (TF5) or TurfJet (TTJ10)].

The addition of a soil surfactant or soil wetting agent is recommended with Quali-Pro Todal. Follow all manufacturer use rates, recommendations, and restrictions.

Quali-Pro Todal is compatible with Quali-Pro Propiconazole 14.3, Quali-Pro Strobe 2L, [Quali-Pro Strobe 50WG](#) Quali-Pro Strobe ~~F~~-Pro and Quali-Pro Mefenoxam 2 AQ fungicides.

USE RESTRICTIONS

Do not apply more than 228 fluid ounces of Quali-Pro Todal (0.27 lb abamectin) per acre per year.

- **DO NOT** apply to golf course roughs.
- **DO NOT** apply to residential turf, sports fields or commercial turf.
- **DO NOT** use aerial application.
- **Chemigation: DO NOT** apply this product through any type of irrigation system.
- **DO NOT** apply through an ultra-low volume spray system.
- **DO NOT** apply to turf under heat or moisture stress.
- **DO NOT GRAZE TREATED TURF OR FEED TURF CLIPPINGS FROM ANY TREATED AREA TO POULTRY OR LIVESTOCK.**

SPRAY DRIFT MANAGEMENT

DO NOT spray when conditions favor drift beyond area intended for application. Conditions which may contribute to drift include thermal inversion, wind speed and direction, sprayer nozzle/pressure combinations, spray droplet size, etc. Contact your State extension agent for spray drift prevention guidelines in your area.

AVOIDING SPRAY DRIFT IS THE RESPONSIBILITY OF THE APPLICATOR. **DO NOT** apply when weather conditions favor drift from treated areas to non-target aquatic habitat.

SPECIFIC USE DIRECTIONS

For control of turf-parasitic nematodes and bermudagrass mites on golf course greens, tees, and fairways

PESTS	RATE (FL. OZ. PER ACRE)*	INTERVAL	COMMENTS
Turf- Parasitic Nematodes	16 to 24	14 – 21 Days	Combination treatments of Quali-Pro Todal and Quali-Pro Strobe 2L <u>50WG</u> or Quali-Pro Strobe Pro are recommended to reduce fungal infections following nematode feeding. Quali-Pro Strobe 2L <u>50WG</u> or Quali-Pro Strobe Pro should be watered in with Quali-Pro Todal.
	24 to 57	21 – 28 Days	
Bermudagrass Mites (<i>Eriophyes</i> spp.)	16 to 24	14 Days	Initiate applications prior to or in the early stages of symptom development. Tank mix with a surfactant or wetting agent and water in with 0.1 to 0.25 inch of irrigation immediately after application.

*Application rate is dependent upon pest pressure and/or nematode assay counts. Use the higher rate for more severe pest conditions or difficult soil types.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Do not reuse empty container.

PESTICIDE STORAGE: Store in a tightly closed container in a cool, dry place.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: *[only the section which applies to the package size will be used on the market label]*

Nonrefillable Container (five gallons or less): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank

or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Dispose of in an incinerator or landfill approved for pesticide containers.

Nonrefillable Container (greater than five gallons): Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Clean container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Dispose of in an incinerator or landfill approved for pesticide containers.

Refillable Container: Refillable container. Refill this container with abamectin only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. For minor spills, leaks, etc., follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup procedures and disposal of wastes.

IMPORTANT: Read the information below before using this product. If the terms are not acceptable, you should return the unopened product container immediately for a complete refund.

WARRANTY STATEMENT

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Control Solutions, Inc. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Control Solutions, Inc. and Seller harmless for any claims relating to such factors.

To the extent consistent with applicable law, Control Solutions, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Control Solutions, Inc., and Buyer and User assume the risk of any such use. CONTROL SOLUTIONS, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

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